

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

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NICOLE ZICCARELLI,

Plaintiff,

v.

THE ALLEGHENY COUNTY BOARD OF  
ELECTIONS, *et al.*,

Defendants.

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NO. 2:20-cv-001831-NR

**MOTION OF SECRETARY OF THE COMMONWEALTH OF PENNSYLVANIA  
KATHY BOOCKVAR TO DISMISS THE AMENDED COMPLAINT OR, IN THE  
ALTERNATIVE, TO GRANT SUMMARY JUDGMENT**

Defendant Kathy Boockvar, in her official capacity as the Secretary of the Commonwealth of Pennsylvania, hereby moves for an Order dismissing all claims in the Amended Complaint with prejudice or, in the alternative, for an Order denying Plaintiff's Motion for Summary Judgment and granting summary judgment in her favor on all claims. In support of this motion, Movant relies on the accompanying Memorandum of Law. A proposed form of Order is attached hereto.

Dated: December 30, 2020

HANGLEY ARONCHICK SEGAL  
PUDLIN & SCHILLER

By: /s/ Michele D. Hangley  
Mark A. Aronchick  
Michele D. Hangley\*  
Robert A. Wiygul\*  
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*Counsel for Defendant Kathy Boockvar, in her  
official capacity as the Secretary of the  
Commonwealth of Pennsylvania*

\* *Admitted pro hac vice*

\*\* *Pro hac vice motion to be filed*

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**CERTIFICATE OF COUNSEL**

In accordance with § II(c) of this Court’s Practices and Procedures, I certify that through a series of written and oral communications between November 25, 2020 and the present, counsel for Defendant Secretary of the Commonwealth of Pennsylvania Kathy Boockvar (the “Secretary”) and counsel for Plaintiff have met and conferred in good faith regarding the issues identified in the Secretary’s Rule 12 Motion to Dismiss the Amended Complaint.

Dated: December 30, 2020

/s/ Michele D. Hangley  
Michele D. Hangley